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26 Attorneys for Defendant
27 VASILE MEREACRE

28 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VASILE MEREACRE,

Defendant.

Case No. CR 18-348 LHK (NC)

**STIPULATION AND [PROPOSED]
ORDER FOR TEMPORARY
RELEASE OF DEFENDANT'S
PASSPORT**

IT IS HEREBY STIPULATED by the parties through their counsel that defendant
VASILE MEREACRE may temporarily possess his passport in order to travel between

1 Florida and California for his upcoming court appearance, which is set for November 8,
2 2018.

3 By way of background, and in support of this stipulation, Defendant states the
4 following:

5 1. Defendant is a Canadian citizen and possesses a Canadian driver's license. He
6 does not possess a driver's license or other similar identification issued by any state in the
7 United States. Defendant is ordered to appear in this Court on November 8, 2018.
8 Defendant currently resides in Florida. He will not be able to travel (i.e. fly) within the
9 United States if his only documentation is his Canadian driver's license; he needs his
10 passport to fly within the United States.

11 2. In order for Defendant to appear before this Court at the upcoming court
12 appearance, it is stipulated by the parties that Defendant may temporarily possess his
13 passport in order to travel. It is agreed that Defendant's passport may be released to
14 defense counsel (Ronald Gainor) no earlier than November 6, 2018 (the day prior to
15 Defendant's flight from Florida to California). Defense counsel shall allow Defendant to
16 retain possession of his passport in the airport for the purpose of checking into his flight,
17 proceeding through security and boarding his flight. Defendant's passport shall be
18 returned to defense counsel once Defendant is on the plane. Defense counsel shall retain
19 possession of Defendant's passport until Defendant is required to again check into his
20 flight, get through security, and board his return flight to Miami. Once Defendant is on
21 the plane, his passport shall be returned to defense counsel (Chris Lyons). Defendant's
22 passport shall be surrendered to the U.S. District Court for the Southern District of
23 Florida no later than Tuesday, November 13, 2018 (Monday November 12, 2018 is a
24 court holiday).

25 3. It is further agreed that Defendant shall provide to Pretrial Services his
26 complete itinerary, including his flight information, the location where he will be staying
27 in California, and a way for Pretrial to contact him by phone while he is in California.

1 4. All other terms of pretrial release shall remain in full force and effect.

2 5. Undersigned counsel have conferred with AUSA Susan Knight who agrees to
3 the requests set forth in this stipulation.

4 SO STIPULATED:

5
6 Dated: October 25, 2018

_____/s/_____
Christopher G. Lyons
Ronald Gainor
Adam Pennella
Counsel for Vasile Mereacre

9
10 Dated: October 25, 2018

ALEX G. TSE
UNITED STATES ATTORNEY

11
12 _____/s/_____
Susan Knight
Assistant United States Attorney

13
14
15
16 SO ORDERED:

17 Dated:

18 _____
Honorable Virginia K. DeMarchi
United States Magistrate Judge